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June 20, 2000

WRITTEN EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W., Room TWB-204
Washington, D.C. 20554

RECEIVED
JUN 20 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-147

Dear Ms. Salas:

Attached is a copy of the report that BellSouth has sent to Lawrence Strickling, Chief of the Commission's Common Carrier Bureau, in response to his request that we describe the steps BellSouth has taken to begin offering line sharing to requesting CLECs no later than the June 6, 2000 deadline. Copies have also been sent to the following Commission staff: Michelle Carey; Margaret Egler; Johanna Mikes; and William Kehoe.

In accordance with Section 1.1206(b)(1), I am filing two copies of this notice in the docket identified above. If you have any questions concerning this, please call me.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachment

cc: Lawrence Strickling
Michelle Carey
Margaret Egler
Johanna Mikes
William Kehoe

No. of Copies rec'd 0+2
List ABCDE

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Mr. Lawrence E. Strickling
Chief, Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Report on Line Sharing

Dear Mr. Strickling:

On December 9, 1999, the Commission released the *Line Sharing Order*¹ that requires incumbent local exchanges carriers ("ILEC") to provide competitive local exchange carriers ("CLEC") access to the high frequency portion of the local loop as an unbundled network element ("UNE").² Pursuant to implementation requirements of the *Line Sharing Order*, you have requested BellSouth Corporation ("BellSouth") to report the steps BellSouth has taken "to ensure that its facilities are prepared to respond to requests for access to the high frequency portion of loop." You requested that the report should include a description of any agreements BellSouth has entered with CLECs to provide this high frequency UNE, including tests, if any, that BellSouth has conducted with requesting carriers. You also ask that BellSouth name an individual as point of contact in the event additional information is requested. In accordance with your request, BellSouth provides the following report.

Preliminary Effort

1. As a first step toward complying with the *Line Sharing Order*, BellSouth invited interested CLECs to a meeting in Atlanta on January 26, 2000. Twenty-seven individuals representing twelve CLECs attended the meeting. BellSouth presented its proposed line sharing offering, including interim rates, subject to true up, as well as a line sharing contract. During

¹ *In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147 and *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, *Third Report and Order in CC Docket No. 98-47 and Fourth Report and Order in CC Docket No. 96-98*, 14 FCC Rcd 20912 (1999) ("*Line Sharing Order*").

² A CLEC's access to the high frequency portion of the loop is referred to as line sharing throughout the *Line Sharing Order* and this report.

that meeting, participants agreed to form several working teams that would develop, test, and refine the procedures for CLECs and BellSouth to use to successfully implement line sharing. This resulted in a series of working-level meetings, the first of which was held on February 2, 2000. The participants jointly decided to have two sub-committees: a technical sub-committee; and a systems/process sub-committee. Each sub-committee would meet one day each week. The technical sub-committee worked on technical issues, such as systems/network architecture and testing. The systems/process sub-committee focused on the pre-ordering, ordering, provisioning, maintenance, and billing issues. Each committee listed and prioritized issues and action items. The sub-committees addressed and resolved issues necessary to developing the architecture and operations plans for the line sharing product. Beginning April 12, 2000, the two sub-committees were consolidated into one committee, with that committee conducting its meetings on one full day each week.

2. The purpose of these CLEC/BellSouth line sharing meetings was to jointly develop procedures and operations plans to implement line sharing. There have been six active participants in this joint CLEC/BellSouth meetings. They are BellSouth, Covad, NorthPoint, Rhythms, NewEdge, and BlueStar. In addition, there are other less active participants in the meetings, including AT&T and Sprint.

Development of a Pilot Program

3. As a part of this joint effort, BellSouth proposed, and the cooperative group agreed, to conduct a collaborative line sharing pilot test. The primary objective of the pilot was to refine BellSouth and CLEC line sharing procedures so that BellSouth and CLECs could successfully implement line sharing on June 6, 2000. The specific pilot objectives included BellSouth helping CLECs determine if end user lines are capable of line sharing, CLECs submitting end user orders, and BellSouth provisioning the upper spectrum of the line for the CLECs to provide data service over the line. All parties worked cooperatively to identify and resolve key ordering, provisioning, maintenance, and repair procedures.

4. The group concluded that Atlanta would be the best location for the pilot. BellSouth offered to equip as many as six Atlanta central offices with splitters for the test pilot. BellSouth offered the CLECs the opportunity to select the central offices. When the CLECs selected seven offices, BellSouth agreed to equip all seven offices. Covad, NorthPoint, and Rhythms participated in the Atlanta Line Sharing Pilot with BellSouth. BellSouth and the CLECs conducted their line sharing pilot in the following Atlanta central offices: Marietta; Roswell; Buckhead; Peachtree Place; Duluth; Sandy Springs; and Chamblee. These pilot sites were selected and prioritized by the CLECs, according to their importance. BellSouth installed splitters in the seven pilot central offices.

5. The CLECs and BellSouth jointly defined the scope of the pilot. The first objective was to provision line sharing for existing BellSouth retail POTS end users. Next the

teams performed in-depth analysis of maintenance flows, attempting to determine all possible subsequent activities, and evaluated their impact on Line Sharing. Testing and evaluation continues on an ongoing basis during the pilot.

6. At each step, BellSouth and the other participants made pilot decisions jointly and shared pilot results with their respective internal implementation organizations responsible for development of the necessary processes and operating support systems ("OSS") enhancements. BellSouth built its processes and work flows based upon both the decisions made in committee meetings and the early findings of the pilot testing, as needed, in order to be ready for the June commercial implementation.

7. In the CLEC/BellSouth meetings, all parties raised various issues and identified items that each hoped would make the pilot more successful. BellSouth used the information gained through the line sharing pilot directly in the development of the commercial line sharing product.

Line Sharing Pilot Summary

8. BellSouth began accepting end user line sharing orders in mid March 2000 for the Marietta Main central office. BellSouth temporarily suspended the pilot due to unanticipated operational difficulties in late March but resumed the pilot in early May after the difficulties were addressed. Between May 2000 and June 2000, seven end user orders for line sharing were issued. The first orders were completed May 2000. The participants of the pilot subsequently decided to extend the pilot beyond the commercial availability date. BellSouth installed three voice lines at one of their locations and ordered xDSL service from each of the three participating CLECs. This established a friendly environment for testing various scenarios, such as changes to another CLEC and voice disconnects. This pilot is still underway.

9. As a final step in the pilot, both BellSouth and other pilot participants intend to review the key findings of the line sharing pilot's processes and procedures. Participants anticipate that this post mortem will be a key component of the pilot. BellSouth continues to incorporate into the line sharing commercial offering information gained from the pilot.

Network Architectures

10. For the commercial offering beginning June 6, 2000, BellSouth offered splitters in increments of a full shelf, 96 line units, or in increments of one fourth of a shelf, 24 line units. BellSouth purchases, installs, inventories, leases, and maintains the splitters. In this arrangement, BellSouth installs a splitter in its equipment space.

11. BellSouth believes it was necessary to minimize the allowable configurations first offered to simplify the initial implementation to insure its ability to meet the requirements of the

Line Sharing Order. BellSouth believes the initial architecture, which allows CLECs the choice of leasing the splitter from BellSouth under the two identified options (increments of 96 line units or 24 line units) is reasonable, flexible, and avoids overly complicated and error-prone process management.

12. Each group of 24 or 96 splitters is uniquely assigned to a specific CLEC. BellSouth provisions all necessary cross-connects to enable the service. Once the splitter is installed and inventoried, a CLEC order to provision line sharing for an end user indicates the splitter assignment and pair to be used for the high frequency portion of the loop (or the data portion). BellSouth runs cross-connects for the incoming line (voice and data), outgoing analog voice, and the necessary jumpers to connect to the splitter. BellSouth runs cross-connects from the splitter to the CLEC's termination point on the frame to provision the high frequency portion of the loop (data).

13. Several CLECs requested the additional option of owning the splitter and placing it in their collocation space. This option, however, requires different operational plans and OSS changes from the options that BellSouth originally offers that will complicate the ordering, provisioning, and repair work processes. For example, the local service request (LSR) would be different for each. The cable inventory in the system and required pair assignment information would be different, requiring dual work processes and OSS interfaces to be maintained. In any given central office, training would be more complicated as a technician would need to know for every order, whether the splitter is in the CLEC cage, in BellSouth's area, full or partial shelf, etc. Only by delaying the CLEC owned splitter option until after the June 6, 2000 commercial offering could BellSouth insure that it could offer line sharing by the ordered date of June 6.

14. BellSouth agreed to investigate an option where the CLEC owned the splitter and to attempt to work through the operational issues in the collaborative meetings, after the successful commercial offering beginning June 6. These discussions have now begun in the collaborative meetings and a special session to discuss this arrangement is scheduled for June 28. Pending resolution of several operational issues, BellSouth expects to offer this additional option prior to September 6, 2000.

Splitter Deployment and Allocation

15. CLECs began to order splitter systems on March 26, 2000, in Georgia and in other states on April 6, 2000. This enabled CLECs to begin providing end user line sharing service on June 6, 2000.

16. The requirement that all ILECs implement line sharing by June 6, 2000 caused an industry wide shortage of splitters. Moreover, the installation technicians needed to install the splitters were limited. Anticipating these shortages, BellSouth had the CLEC participants in the pilot program submit forecasts of splitter needs by central office. The CLEC participants also

prioritized the central offices for splitter deployment. Additionally, BellSouth encouraged the development of rules to be used to allocate the available splitters. These rules were memorialized in a document called "Rules for Splitter Allocation."

17. BellSouth and the other participants developed the priority for deploying splitters based on the Rule for Splitter Allocation, the CLECs' central office priority list, and the splitter orders received from CLECs. Consequently, while not every central office had splitters deployed by June 6, the central offices deemed most critical by the CLECs had splitters and BellSouth was working effectively with the CLECs to allocate splitters fairly among those CLECs that submitted orders.

18. The CLECs desired Georgia central offices to be implemented first. Splitters were ordered in 54 Georgia central offices. By June 6, 2000, splitters had been installed and were operational in 50, or 93%, central offices. Three other splitters will be installed and operational by July 6, 2000. BellSouth anticipates installing the remaining splitter by August 10, 2000. The majority of these installations could not be completed earlier because of central office space issues.

19. BellSouth now has deployed an allotment of splitters for each CLEC that submitted a splitter order. BellSouth continues to work with the CLECs to complete the installations of splitters and to eliminate the backlog of splitter orders.

20. On June 6, 2000, BellSouth began accepting end user line sharing orders from CLECs that had splitters in place.

Line Sharing Agreements

21. BellSouth has reached agreement with Covad, NewEdge, InterLoop, NorthPoint, and Rhythms for the ordering and provisioning of line sharing in the BellSouth region. Many of the general provisions and operational terms and conditions were worked out in the weekly collaborative meetings. Specific language for each CLEC was negotiated to satisfy the specific needs of that CLEC. These agreements contain interim rates, subject to true up following completion of the individual state regulatory bodies' rate proceedings. These agreements with interim rates helped line sharing begin by June 6, 2000.

22. In general, the terms and conditions that BellSouth developed for line sharing reflect the methods, practices, and architectures that were discussed during the collaborations and refined as a result of the line sharing pilot. The terms are also consistent with BellSouth's current xDSL provisioning standards, e.g. the loop pre-qualification, loop qualification, ordering, and provisioning. BellSouth plans to use existing processes and procedures related to the current xDSL-capable loop offering as much as possible to reduce the amount of change in work flows for all involved parties.

Mr. Lawrence Strickling
Chief, Common Carrier Bureau
Federal Communications Commission
June 20, 2000
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23. Consistent with the *Line Sharing Order*, BellSouth's proposed offering of the high frequency portion of the loop is available to a single requesting carrier, on loops that carry BellSouth's POTS, to the extent that the xDSL technology deployed by the requesting carrier does not interfere with the analog voiceband transmissions. It is BellSouth's intent to offer line sharing wherever the CLECs deploy any version of xDSL that is presumed acceptable for shared-line deployment in accordance with Commission rules and will not significantly degrade analog voice service. The offer meets the prerequisite that an ILEC be providing voiceband services on the loop before a CLEC may obtain access to "the high frequency portion of the loop," which, consistent with the *Line Sharing Order*, is defined as the frequency above the voice band on the copper loop facility that is being used to carry analog voice band transmissions.

Conclusion

We believe that the above discussion demonstrates BellSouth's full compliance with the *Line Sharing Order*. BellSouth's line sharing implementation plans incorporate the network architectures and work processes identified in the line sharing collaborative meetings and allowed for full commercial rollout of line sharing on June 6, 2000 compliance date.

I will serve as the point of contact should you need any further information on this subject. You may contact me by phone at 202-463-4113, or by mail at 1133 21st Street NW, Suite 900, Washington, DC 20036.

Very truly yours,


Kathleen B. Levitz

CC: Michelle Carey
Margaret Egler
Johanna Mikes
William Kehoe